

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**PHARMACEUTICAL RESEARCH  
AND MANUFACTURERS OF  
AMERICA,**

*Plaintiff,*

v.

**PATRICK MORRISEY, in his official  
capacity as Attorney General of West  
Virginia, et al.,  
Defendants.**

**No. 2:24-cv-00271**

**Judge Thomas E. Johnston**

**JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS' MOTION TO CONSOLIDATE**

Plaintiff Pharmaceutical Research and Manufacturers of America (“PhRMA”) and Defendants by and through undersigned counsel jointly move the Court to enter an order providing PhRMA a 14-day extension of time to respond to Defendants’ motion to consolidate. *See* ECF No. 60. In support, the parties state as follows:

1. On November 5, 2024, Defendants filed a motion to consolidate this action with three other actions currently pending, *AstraZeneca Pharmaceuticals LP v. McVey*, No. 2:24-cv-290, *AbbVie, Inc. v. Morrissey*, No. 2:24-cv-298, and *Novartis Pharmaceuticals Corp. v. Morrissey*, No. 2:24-cv-00272.

2. This Court suspended the briefing schedule on that motion until fourteen days after the Court’s ruling on the PhRMA’s then-pending motion for a preliminary injunction. ECF No. 64.

3. The Court granted PhRMA’s motion for a preliminary injunction on December 17, 2024. ECF No. 68. PhRMA’s response to the motion to consolidate is therefore due on December 31, 2024.

4. On December 30, 2024, plaintiff in *Novartis*, No. 2:24-cv-00272, jointly moved with Defendants for an extension of time to respond to Defendants' motion to consolidate, shifting the deadline from December 31, 2024 to January 14, 2025. That request was granted on December 30.

5. Given the deadline of December 31 falls on New Years Eve and to permit adequate time for PhRMA to prepare its response to the pending motion to consolidate, the parties **AGREE** and **STIPULATE** that PhRMA should be afforded additional time to respond to Defendants' motion to consolidate.

6. Accordingly, the parties respectfully request that the Court enter an order extending PhRMA's deadline to respond to the motion to consolidate until January 14, 2025.

7. This 14-day extension will not prejudice any party to this action.

Dated: December 31, 2024

Respectfully submitted,

/s/ Joseph V. Schaeffer

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**CERTIFICATE OF SERVICE**

The undersigned, as counsel for Plaintiff, hereby certifies that on December 31, 2024, I electronically filed the *Joint Motion for Extension of Time for Plaintiff to Respond to Defendants' Motion to Consolidate* with the Clerk of the Court via the CM/ECF system which will send an electronic notification to counsel of record as follows:

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